

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

THE FEDERAL SAVINGS BANK,

Plaintiff,

v.

PAUL J. MANAFORT, KATHLEEN B. MANAFORT, SUMMERBREEZE, LLC, NEW YORK STATE DEPARTMENT OF TAXATION & FINANCE and "JOHN DOE 1" through "JOHN DOE 10", the John Doe names being fictitious, said parties intended to be tenants or occupants, if any, having or claiming an interest in, or other entities having a lien upon, the premises described in the complaint,

Defendants.

Case No. 2:21-cv-01393-SJF-AYS

NOTICE OF DEFENDANTS' FEDERAL RULE OF CIVIL PROCEDURE 12(B)(6)
MOTION TO DISMISS PLAINTIFF'S COMPLAINT

PLEASE TAKE NOTICE that for the reasons set forth in the accompanying Memorandum of Law, dated May 20, 2021, and upon the prior proceedings and pleadings filed in this Action, Defendants Paul J. Manafort, Kathleen B. Manafort, Summerbreeze, LLC will move this Court at the United States Courthouse for the Eastern District of New York, 100 Federal Plaza, Courtroom 830, Central Islip, New York 11722, for an Order dismissing Plaintiff's Complaint in its entirety with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

Date: May 20, 2021

Respectfully Submitted,

/s/ Rodney Perry

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